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Command

RESPONSIVENESS SUMMARY

FOR

HAZARDOUS WASTE REMOVAL ACTIONS AT

NAVAL STATION TREASURE ISLAND, HUNTERS POINT ANNEX

SAN FRANCISCO, CALIFORNIA

DOCUMENTS DEPT.

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REMOVAL ACTIONS, HUNTERS POINT ANNEX SAN FRANCISCO, CALIFORNIA RESPONSIVENESS SUMMARY

A. OVERVIEW

On December 2, 1988 the United States Navy announced through an Information Release to the Hunters Point Annex mailing list that removal actions were being considered at five sites within Hunters Point Annex. These sites were:

Tank S-505

Pickling and Plate Yard

Battery and Electroplate Shop

Tank Farm

Building 521 Power Plant

On April 14, 1989 the Navy announced that Action Memoranda had been completed for four of these sites. The Navy also announced a public comment period lasting until May 12, 1989. To obtain additional public comment the Navy further announced a public meeting scheduled for May 5, 1989, followed by an Information Open-House in the Bayview community.

The removal actions were proposed to remedy situations where the Navy believes that hazardous waste, while presently stable, could in the future cause a potential threat to public health or the environment. Removal actions would prevent this by removing hazardous waste, and structures contaminated with hazardous waste at locations subject to exposure to rain, wind and sun.

A removal action was considered but rejected at the Battery and Electroplate Shop.

There are a number of commercial businesses in close proximity to two of the proposed sites. Given the potential threat to public health posed to the surrounding area by these removal actions, and the need for a safety-buffer zone; the Navy sent letters to twenty businesses, all of whom are Navy tenants. These letters informed these businesses that they may be forced to vacate the property due to their proximity to sites undergoing remediation. Letters were sent to all businesses within 250 feet of the perimeter of the Tank Farm and Pickling and Plate Yard.

During the May 5, 1989 public meeting, strong concerns were expressed by these businesses regarding both the need for the removal actions, and the scientific basis for the 250 foot safety buffer zone. The businesses also requested that the Navy extend

the written comment period past May 12, 1989. Comments were also received from both regulatory agencies and the businesses that the draft action memoranda prepared for the removal actions were not specific enough to respond to.

On June 6, 1989 the Navy announced that the written public comment period would be extended to June 16, 1989.

These sections follow:

- o Background on Community Involvement
- O Summary of Written Comments Received during Public Comment Period and Navy Responses
- Summary of Public Questions and Navy Responses at May 5, 1989 Community Meeting
- o Attachment 1: Written comments received
- Attachment 2: Community Relations Activities at Hunters
 Point Annex
- O Attachment 3: Hunters Point Annex Environmental Outreach Program: Summary and Record of Dates

B. BACKGROUND ON COMMUNITY INVOLVEMENT

Community interest in the environmental cleanup of Hunters Point dates back to 1987 when the Navy proposed the Homeporting of the U.S.S. Missouri battle group at Hunters Point Annex. The battle group would be homeported at a new Naval Station San Francisco. Plans included 1,500 new housing units as well as a full-service naval activity. The proposed homeporting plan quickly became one of the most controversial issues facing San Francisco.

At the same time the Navy completed a confirmation study of hazardous waste contamination at Hunters Point Annex. This study documented eleven sites where sufficient evidence existed of hazardous waste contamination to warrant a full investigation.

With completion of this confirmation study, and the areas identified as contaminated, a number of groups and individuals questioned whether or not Naval Station San Francisco could be constructed consistent with public health requirements. This resulted in the environmental clean-up issue being thrust into a highly-visible process covered extensively by the media.

In early 1989 the Base Realignment and Closure Commission's Report was adopted by Congress. This report ended the proposed homeporting of the U.S.S. Missouri. Since that time the City and County of San Francisco has proposed that the Navy consider the joint civilian/military use of the 522 acre site. The City and County's proposal envisions an expanded ship repair facility and

naval support facility, housing, commercial business, and light industrial/research and development park.

Many of the sites proposed by the City and County of San Francisco for joint Navy/civilian use are contaminated with hazardous waste. Therefore, the completion of the environmental clean-up is a prerequisite to any future development, be it by the Navy or a joint Navy/City and County of San Francisco program. Thus, there continues to be interest in the environmental clean-up.

The future development of Hunters Point Annex has been of deep interest to the surrounding community of Bayview/Hunters Point. Many in the community see economic development as the answer to the drug and high unemployment problems present in the community. As the largest piece of largely vacant land suitable for all types of development, Hunters Point Annex is viewed as an economic opportunity.

Hunters Point Annex was leased to a private company from 1976-1986. During this time the land was sub-leased to a number of commercial tenants, employing up to 800 people. When the Navy took control of Hunters Point Annex back from the private company, it continued to honor, on an interim basis, the licenses the remaining commercial tenants held. These commercial tenants have been a strong participant in discussions on the future of Hunters Point Annex, as well as participants in the environmental cleanup.

The Navy has undertaken a wide variety of community relations activities to ensure full participation of the community. This has included development and implementation of an environmental outreach program described in Attachment 3. These techniques have successfully increased community awareness and involvement in the cleanup process, including increasing the site's mailing list from 240 groups and individuals to almost 700. Attachment 2 contains a summary of community relations activities that have been conducted at Hunters Point Annex.

Recognizing that the action memoranda for which the Navy conducted the initial public comment period on was a conceptual document, the Navy will hold a second public comment period on the specific workplans for each removal action. This public comment period will conclude on 16 MARCH 1990. - This responsiveness summary will be updated to reflect any additional comments received in this second public comment period.

- C. SUMMARY OF WRITTEN COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD AND NAVY RESPONSES
 - 1. The California Department of Health Services (DHS) stated that the action memoranda were not detailed enough for specific comment.

Navy Response: The Navy has developed specific workplans for each removal action site, and has started a second public comment period.

2. DHS commented that an appropriate rationale for the width of the exclusion zone should be provided and reviewed to determine if the size of each exclusion zone is sufficient to protect public health.

Navy Response: Harding Lawson's sub-contractor, Aqua Terra Technology, did computer air dispersion models for the Pickling and Plate Yard and Tank Farm. The purpose of these models was to determine an appropriate safety buffer zone around each worksite to ensure that the remedial work did not pose a hazard to workers and residents of the community. The models used as inputs the results of sampling of the hazardous constituents found at the sites, the work to be performed and meteorological data from the thirty worst days of the year.

The first model was based upon the risk to public health from cancer-causing chemicals. The safety buffer zone was defined as any area where the expected cancer risk due to exposure to these removal actions would exceed one in one-hundred thousand. This is the risk level defined in the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65). Concurrence on this risk level was obtained from the Bay Area Air Quality Management District.

The second model used the same inputs, but was based on risks to public health from non-cancerous Environmental Protection Agency priority pollutants. The levels of acceptable risk were provided by the Bay Area Air Quality Management District.

3. DHS commented that sandblasting at the Pickling and Plate Yard could potentially result in uncontrolled releases of contaminated dusts or mists, and the structures be dismantled and disposed as hazardous waste.

Navy Response: As described in Response #2, the Navy has developed computer air dispersion models to assess air emissions from proposed remedial work at the Pickling and Plate Yard. The first-run of these models indicated that uncontrolled sandblasting of the zinc chromate

residue would result in unacceptable releases of hazardous constituents. Uncontrolled sandblasting would require a safety-buffer zone of up to 2,000 feet from the work zone (see Figure 1).

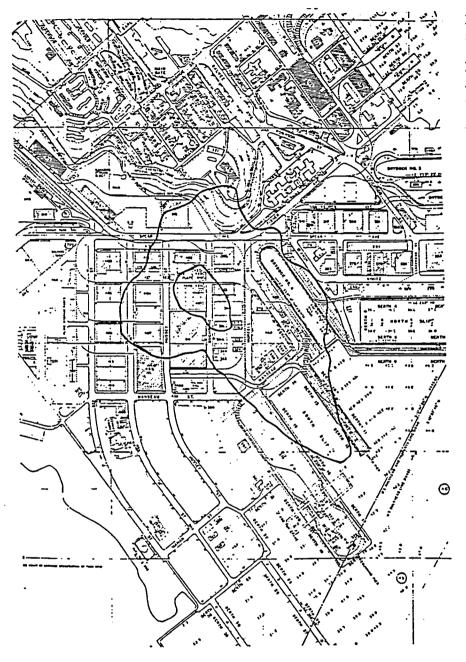


Figure One: The shaded areas on this map of Hunters Point Annex show areas where exposure to wind-borne hazardous residue from the Pickling and Plate Yard removal action would create unacceptable health affects. The larger zone is for open sandblasting of materials. smaller zone reflects sandblasting confined to within a temporary enclosure. The irregular shape of this zone reflects the weather data inputs to the models. since on average wind blows from north-west to south-west, the zone is greatest to the south-west.

To reduce this potential risk, and in response to suggestions from the community; the Navy then asked its contractors to investigate a number of mitigation measures. These mitigation measures included doing a major portion of the zinc chromate removal by hand chipping. Structures would then be dismantled and moved

to a temporary enclosure to be constructed at the center of the Pickling and Plate Yard. Sandblasting of the dismantled structures would be done within this temporary enclosure.

Based upon an analysis of the type of structure to be used, the Navy's contractor has estimated that this enclosure will reduce air emissions by 90 percent.

Based upon a 90 percent emission reduction, the Navy did a second run of the air dispersion computer models to calculate a new safety-buffer zone. The results of this model indicate a substantial reduction in the safety-buffer zone as indicated in Figure 1.

Notwithstanding these mitigation measures, seven businesses must still be displaced. In addition, the Navy will close portions of Cochran and Mossey Streets in the vicinity of the Pickling and Plate Yard.

The Navy will conduct air monitoring throughout the removal action to assure that containment is occurring within established safety limits upon which these models are based. Should air monitoring indicate that the containment system is failing, the Navy will immediately stop work and reevaluate available options including, as a last resort vacation of buildings.

Given these precautions, which the Navy has now included in the revised workplan for the Pickling and Plate Yard, the removal actions will not pose a threat to workers or community residents. Moreover, the implementation of these removal actions will ensure that these sites will not in the future release toxic constituents into the environment.

4. The United States Environmental Protection Agency commented that they felt the proposed removal actions were non-time critical, and subject to the additional requirements of the proposed revision of the National Contingency Plan.

Navy Response: The Navy has considered the comments of the EPA, but continues to believe that these removal actions are time-critical. The Navy has met and exceeded public participation requirements for non-time critical removal actions proposed in the revisions to the National Contingency Plan. Specifically, the Navy has held a public comment period and a community meeting. A second public comment period will be held on the detailed workplans, with appropriate revisions made to this Responsiveness Summary. Three Information Releases have discussed aspects of the removal actions. The Navy's designation of these actions as time-critical

is not an effort to limit public participation, but a reflection of the Navy's belief that the potential risks posed by these sites must be remediated as soon as possible. The Navy remains committed to meet and exceed standards for community involvement regardless of an action's designation.

5. The West Bay Law Collective (WBLC) commented that the 250 foot buffer zone was arbitrarily chosen and that determinations on displacement should be based on actual risk assessments.

Navy Response: See responses to Comments #2 and 3.

6. WBLC commented that containment by enclosing the toxic removal site while the removal occurs should produce a lower risk factor.

Navy Response: See response #3.

7. WBLC stated that tenants should be given a notice of vacation at the point at which a real determination has been made of the risk involved.

Navy Response: No tenants have been given final notices to vacate while the additional study occurred, and public comment concluded.

8. WBLC commented that the 250 foot buffer zone might be drawn from the center of the removal site rather than the perimeter.

Navy Response: The Navy has re-evaluated the area subject to the buffer zone. While the Navy initially believed that work might occur throughout the entire Pickling and Plate Yard, subsequent reevaluation has narrowed the work areas to specific locations identified in the workplan.

The Navy is now basing the safety zone on the results of the computer air dispersion model described in Responses #2 and 3. This model is is based upon the mitigation measures identified in Response #3.

Notwithstanding these mitigation measures, however, seven businesses must still be displaced. In addition, the Navy will close portions of Cochran and Mossey Streets in the vicinity of the Pickling and Plate Yard. These road closures will not result in the displacement of any additional businesses.

The Navy will conduct air monitoring throughout the removal action to assure that containment is occurring within established safety limits upon which these models are based. Should air monitoring indicate that the

containment system is failing, the Navy will immediately stop work and reevaluate available options including, as a last resort vacation of buildings.

No safety buffer zone will be necessary at the Tank Farm pursuant to the computer air dispersion model.

9. WBLC stated that concern should be given that businesses operating on the Yard not be forced to move unnecessarily.

Navy Response: Tenants will only have to move if they are within the buffer zone identified in the results of the computer modeling described in Responses #2 and 3. Timing of the move will be coordinated with the expected start of remedial work at the site. The number of affected tenants has been reduced from twenty to seven.

10. West Edge questioned the basis and legitimacy of establish a forbidden zone at 250 feet.

Navy Response: See Responses #2 and 3. West Edge is no longer within the safety buffer zone.

11. West Edge stated that prevailing winds blow across the yard with amazing consistency and building 401 is directly upwind from the plate yard.

Navy Response: The computer modeling described in Response #2 used average meteorological data. While the predominant wind pattern at Hunters Point is west to east, a risk assessment must be based upon average information. While seeming to be predictable, the Navy could not accept the risk that remedial work would occur on a rare day when an abnormal wind pattern was present. Notwithstanding this discussion, mitigation measures adopted by the Navy will result in West Edge not being affected by the removal action.

12. West Edge stated that they don't want to be forced out until they would really have to.

<u>Navy Response</u>: West Edge will not be required to vacate the building as a result of this removal action.

13. West Edge asked if they can come back and reoccupy our space after the job is done.

Navy Response: West Edge will not have to vacate the building as a result of this removal action.

15. Businesses of Hunters Point Shipyard (BHPS) asked if a tent-like enclosure employing a canvas-like material, possibly with an impermeable coating could adequate protect the public health.

Navy Response: See Response #3.

16. BHPS stated that affected businesses would be willing to contribute to the cost of enclosing either the sites or their own buildings.

Navy Response: While the willingness of the affected businesses to contribute to the costs of containment structures is noted, the Navy has decided that these structures must be an integral part of the removal action. Therefore, the Navy will not be asking any of the affected businesses to contribute to the costs of these structures.

17. BHPS stated that retention of existing businesses should be a consideration secondary only to protecting the health and safety of personnel and the environment.

Navy Response: The Navy concurs that protecting the health and safety of personnel, and protecting the environment must be the primary consideration in the environmental clean-up of Hunters Point Annex. The Navy has taken measures to accurately determine the health risks involved in the removal action, and to minimize those risks. The number of affected businesses has been reduced from twenty to seven.

18. BHPS commented that considering Hunters Point Annex is a patchwork of identified toxic waste sites, why has the Navy chosen to remediate the removal action sites at this time.

Navy Response: This question is answered through the consideration of the characteristics of the various Hunters Point Annex sites. There are three primary large sites at Hunters Point Annex: The Landfill, Bayfill and Sub-Base areas. While we know that these sites contain hazardous wastes, we don't know exactly where these hazardous wastes are. Also, the wastes are not evenly spread throughout the sites. Since the wastes are underground, the only way to locate and accurately identify the types of hazards is to do extensive subsurface testing and analysis. For example, the tests on the Landfill will include 64 borings, 18 wells, four trenches, five geophysical profiles, 90 water samples, and 532 soil samples just to locate and identify them. These tests will take a great deal of time but must be completed before the Navy can propose a method of cleanup.

The four sites chosen for removal actions are entirely different from the Landfill, Bayfill and Sub-Base sites. Hazardous wastes at the Pickling and Plate Yard are in a small area and mostly on the surface. The Tank Farm,

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Tank S-505 and Building 521 are similiar in their characteristics.

Since the wastes at these sites are mostly on the surface, they are exposed to the weather. These wastes are subject to high winds, winter storms and sunlight. This means that these wastes are a greater threat to the people working at Hunters Point and the environment than other sites.

Also, preparation of the remedial plans for the Bayfill and Landfill sites will take several years while the plans for removal of the waste at the other sites will take only a few months. All of these factors have led the Navy to favor the immediate clean-up of the four removal action sites, while continuing the planning for the other sites.

A removal action was considered at Building 123, however the Navy determined that the potential health risk did not justify a removal action.

19. BHPS stated that panelists at the public meeting were unable to offer a definitive basis for the choice of a 250 foot buffer zone.

Navy Response: See Responses #2 and 3.

20. BHPS asked what evidence from other cleanup projects can be cited as precedents for the 250 foot buffer zone at these two sites.

Navy Response: It is standard practice a hazardous waste remedial actions to have a buffer zone between the work area and "clean" areas. Regarding the actual distance involved, see Responses #2 and 3.

21. BHPS asked if airborne substances pose a threat at 250 feet, given the gusting wind conditions might they not also pose a threat at considerably farther distances, specifically contaminating the bay.

Navy Response: In response to this question, the Navy requested that the computer air modeling consider the possible impacts to surrounding businesses and residential areas. With mitigation measures that have been included in the work plan, the results of this modeling indicate that there is no risk to surrounding businesses residential areas. (See Response #3 and Figure 1.)

22. BHPS asked that given the strength and direction of the prevailing winds, is a buffer zone even an appropriate strategy for countering the threat of airborne toxics.

Navy Response: As described in Responses #2 and 3, the Navy has developed a computer air dispersion model to assess air emissions from proposed remedial work at the Pickling and Plate Yard.

To reduce the potential risk, the Navy has revised the workplan for the Pickling and Plate Yard to include the following mitigation measures. The Navy will do a major portion of the zinc chromate removal using hand chipping. Structures will then be dismantled and moved to a temporary enclosure to be constructed at the center of the Pickling and Plate Yard. Sandblasting of the dismantled structures will be done within this temporary enclosure.

With these mitigation measures, the air dispersion computer model indicate that the removal action will not pose a potential threat to public health or the environment.

The Navy will conduct air monitoring throughout the removal action to assure that containment is occurring within established safety limits upon which this model is based. Should air monitoring indicate that the containment system is failing, the Navy will immediately stop work and reevaluate available options including, as a last resort vacation of buildings.

23. BHPS asked that in a building where several businesses occupy discrete areas, with some falling within the buffer zone and others not, will all businesses in the building be forced to vacate.

Navy Response: The only building split by the safety-buffer zone is Building 366. This building has no "discrete" areas as tenants share the entire space. As the majority of Building 366 is within the safety-buffer zone, the entire building must be vacated.

24. BHPS asked what role the public meeting on May 5th plays in the development of cleanup plans.

Navy Response: The Navy is fully committed to a strong community relations program, and has employed measures far in excess of regulatory requirements. Each comment received at the public meeting, and each written comments has been carefully considered against the clean-up plans. Based upon public comments the Navy contracted for computer air modeling to determine the buffer zone, and asked its contractor to explore other clean-up techniques. Each comment received is included in this Responsiveness Summary, as is a summary of community relations measures taken by the Navy. Based upon the input from the process, the number of

businesses affected by these removal actions has been reduced from twenty to seven.

25. BHPS asked if it is possible that the announced departure schedule may be set back to allow further investigation of the hazards and safeguards, with a view towards minimizing tenant displacement.

Navy Response: The Navy has set-back the departure schedule pending the requested investigations. Tenant displacement has been reduced from twenty businesses to seven.

26. BHPS asked if tenants can reoccupy their buildings after the clean-up, what assurance will there be that they won't be displaced again by clean-up activities.

Navy Response: Current estimates are that the removal (cleanup) action at the Pickling and Plate Yard will require more than sixty days. This length of time will likely make infeasible tenant reoccupation of buildings.

27. BHPS asked if it would be possible for tenants to relocate to other buildings at Hunters Point Annex.

Navy Response: Relocation may be considered subject to certain conditions. In addition, relocation is subject to identification of a "suitable" alternative space which is not necessary for Navy or government needs.

28. BHPS asked if displaced tenants can relocate, are cleanup plans sufficiently advanced to ensure these locations will not be subject to displacement.

Navy Response: The Navy is in the early stages of remedial investigation of the large sites at Hunters Point Annex. This investigation will include an examination of the various alternatives to remedial actions. Pending completion of these studies, it is impossible to predict that extent of contamination at the site, and the technology appropriate to remedy that contamination. Therefore it is impossible to determine what future requirements may be for buffer zones.

29. BHPS asked what the general future plans for the remaining clean-up of Hunters Point Annex.

Navy Response: The Navy will continue the clean-up of Hunters Point annex in full consultation with the public and regulatory agencies. Since proposal of Hunters Point Annex on the National Priorities List by the United States Environmental Protection Agency, the Navy will enter into an Interagency Agreement with EPA and the State of California, should the State desire. This

agreement will specify the responsibilities of each party, and a schedule of deadlines for milestones. The deadlines and the terms of the agreement are enforceable. The agreement will be subject to public review and comment. The Navy will continue its commitment to a vigorous community relations program.

30. BHPS asked how the Navy will respond to the questions and concerns raised at the May 5th meeting, and within what time frame.

Navy Response: Each comment has been reviewed and a response included in this Responsiveness Summary. The Navy delayed comment until completion of the additional investigation requested at this public meeting and in written comments received.

31. S.L. Gordon asked if the length of time needed for cleanup is 30 days or less can they return to their shop after the cleanup is completed.

Navy Response: S.L. Gordon is no longer affected by the removal action.

32. S.L. Gordon asked if the cleanup period is more than 30 days can they be relocated to another space at Hunters Point.

Navy Response: S.L. Gordon is no longer affected by the removal action.

33. S.L. Gordon asked what the procedures for relocation are.

Navy Response: S.L. Gordon is no longer affected by the removal action.

34. Smith-Emery Company (SEC) asked about the potential for relocation at Hunters Point Annex.

Navy Response: SEC is no longer affected by the removal action.

35. SEC asked if there are Department of Defense funds available for relocation assistance sine the Navy is evicting them for their convenience.

Navy Response: SEC is no longer affected by the removal action.

36. SEC stated that no evidence has been presented concern the nature and scope of the hazardous materials below ground, and no information has been presented on the scientific correctness of the 250 buffer zone.

Navy Response: See Responses #2 and 3. SEC is no longer affected by the removal action.

37. SEC asked about replacing a PCB transformer with a non-PCB transformer pursuant to a long-term lease.

<u>Navy Response</u>: This question is not the subject of the removal action. Any questions relating to possible long-term leases should be directed to the Commanding Officer of Naval Station Treasure Island.

38. SEC asked when a response will be given to their previous comments.

Navy Response: See Response #30.

39. Christian Engineering (CE) asked if they kept their front door closed, and used a different entry, could they remain.

Navy Response: While the space CE occupies in Building 411 is outside the buffer zone, the Navy concurs with CE that their front door must remain sealed during the removal action, and a different entry used.

40. CE stated that their shop is in the back half of Bldg. 366 which they consider to be unaffected.

Navy Response: See Response #23.

41. CE would be willing to either restrict operations to evenings, or close the shop during the duration of the cleanup.

Navy Response: Due to safety concerns given the results of the computer modeling described in Responses #2 and #, all structures within the safety-buffer zone must remain vacant.

42. CE stated that an information release stated that 11 PCB transformers will be removed, and asked if they will be affected.

Navy Response: This question is not related to the removal actions. Questions regarding the provision of utility services at Hunters Point Annex should be directed to the Commanding Officer of Naval Station Treasure Island.

43. CE observed that there exists a wide body of talent at Hunters Point annex that could provide expertise in the environmental clean-up.

Navy Response: The Navy welcomes the participation of

all interested persons in the environmental clean-up of Hunters Point Annex. Questions or suggestions can be directed to

Randal Friedman, Code 022 Commander Naval Base San Francisco Building 1, Treasure Island San Francisco, CA 94130 (415) 765-5613

44. Point Design Woodworks stated that even thought their business is outside the 250 foot buffer, they are still concerned about their safety.

Navy Response: See Response #2 and 3.

45. Point Design Woodworking hoped that the Navy would be willing to consider alternatives such as an inexpensive enclosure similiar to ones used in the fumigation of houses.

Navy Response: See Response #3.

(1) Ms. Barbara Sahm

What kind of containment is planned for the asbestos removal at the power plant?

Navy Response

This has not been determined at this time because the Navy has not yet hired a contractor for the removal. The Navy will perform the removal in accordance with applicable regulations and the Bay Area Air Quality Management Control District (BAAQMD) will be consulted.

(2) Mr. Wartelle, Lawyer for Hunters Point Annex Tenants

Who decides on the final remedial action plans for the removal action sites and what is the role of the regulatory agencies and the public in their development?

Navy Response

The remediation plan is developed by the Navy and their contractor. It be will consistent with the overall site remediation. The plan will be submitted to the regulatory agencies for review and comment prior to finalization and implementation.

(3) Mr. Wartelle

What is the time table for the removal actions? The tenants have been notified and the 250-foot buffer zone has been established but the cleanup plans have not been developed.

Navy Response

The removal actions are interim remediation activities being conducted as part of the overall Remedial Action Plan. Plans that have currently been prepared present a conceptualization of the removal actions. Work plans that will be prepared will include more detail concerning implementation of the removal actions.

The timing of these interim activities is independent of other remediation activities. Following the removal actions, additional investigation will continue to further investigate the sites and, eventually, there will be a complete cleanup. We will continue to invite public participation.

(4) Mr. Wartelle

How was the 250-foot buffer zone for each removal action site determined? Have climatic data been considered in developing this number?

Navy Response

The factors considered in developing this number were 1) safety of the tenants, 2) potential liability to the Navy, and 3) potential for environmental contamination. The Navy's contractor will do air sampling and wipe tests in the vicinity of each removal action to document whether airborne contaminants are migrating to nearby structures. The work plan will address this. The Navy will have dispersion modeling performed to evaluate the buffer zone and evaluate whether it should be enlarged.

(5) Mr. Wartelle

Have alternatives to the buffer zone, such as containment chambers, been considered?

Navy Response

Containment measures considered include keeping the ground wet to control releases of airborne contaminants. Construction of physical containment structures outdoors is difficult because of wind and other environmental factors. The Navy will consider all proposals and alternatives submitted.

The airborne contaminants of concern at three of the removal action sites include particulates containing heavy metals or petroleum products. These particulates are also more difficult to contain than asbestos. Grit blasting at the Pickling and Plate Yard is also of concern in terms of airborne contaminants. The BAAQMD will monitor this site.

(6) Mr. Wartelle

At the Pickling and Plate Yard, 17 tenants located within the 250-foot buffer zone will be displaced by the removal action. Will the displacement occur before the dispersion modeling is complete?

Navy Response

The major factor in determining the buffer zone limits was potential liability to the Navy, which includes physical safety issues associated with construction. The Navy cannot say that the 250-foot zone will be changed at this time. Submit the question in writing and it will be considered. At this time, displacement of the tenants is planned by fall of 1989.

(7) Mr. Wartelle

Why was the decision made to conduct interim removals at these four sites first?

Navy Response

These sites lend themselves to remediation because the contamination is near the surface and there is good access to the sites. These sites are also better understood at this time than the other sites at Hunters Point Annex.

(8) Mr. Wartelle

Has on-site treatment of the waste been considered as an alternative to off-site disposal? The tenants would prefer on-site treatment methods.

Navy Response

Treatment options will be considered as part of the Feasibility Study (FS) to be conducted at the site. The FS is planned for 1991. The removal actions are planned for October 1, 1989 and remediation activities at these sites are intended to be consistent with the overall site remediation. The Navy is trying to get community input at the early stages of the removal action planning.

(9) Mr. Tom Lacey, B.H.P.S. (at Pickling and Plate Yard)

Will the businesses displaced from the 250-foot buffer zones be given the opportunity to relocate within Hunters Point Annex? Will they be able to move back to their original locations after the removal actions are complete?

Navy Response

Written requests for relocation will be considered on a case-by-case basis. The tenants might not be allowed to move back after the removal actions are completed because additional investigative and remediation activities will probably be required at each of these sites. The removal actions should require about two months.

(10) Mr. Steve Castleman, San Francisco District Attorney's Office

The Navy stated that Tank 505 is partially fenced. Why isn't it totally fenced and why aren't the other removal action sites fenced?

Navy Response

Tank 505 is totally fenced.

(11) Mr. Castleman

The DA's office would like to be informed of any activities at Tank 505 because of the need to preserve evidence that may be used as part of the City's criminal action against Triple A.

Navy Response

The Navy agreed to notify the DA's office.

(12) Mr. Castleman

What is the status of the seven Preliminary Assessment (PA) sites being addressed separately from the other Navy sites?

Navy Response

The Navy has received the draft PA report and it is undergoing internal review. Submittal of the report to the regulatory agencies is planned this month.

(13) Mr. Castleman

Is the Navy looking at waste disposal sites other than those identified by the DA's office?

Navy Response

The Navy will be doing a PA for the entire site.

(14) Mr. Castleman (comment)

Triple A is alleged to have disposed waste throughout the site in any open space, and in some cases, subsequently paved over some disposal areas. Three parking lots were alleged to be disposal sites prior to paving. The DA's office strongly suggests that the comprehensive PA and investigations conducted by the Navy include any open space such as parking lots. Past waste management practices of non-Triple A tenants should also be investigated.

(15) Mr. Robert Christian, President of Christian Engineering

Where does the 250-foot buffer zone at the Pickling and Plate Yard start?

Navy Response

As part of planning for the removal action, the buffer zone was considered to start at the perimeter of the Pickling and Plate Yard. The final limits of the 250-foot buffer zone have not been determined at this time.

(16) Mr. Christian

The removal action at the Pickling and Plate Yard will only affect a part of the yard. Who should he talk to about the designation of the 250-foot buffer zone?

Navy Response

Submit the question in writing to Captain Krumm.

(17) Scott Madison, Shipyard Business

Does the Navy have experience at other sites where the 250-foot buffer zone was used?

Navy Response

There is no precedent for establishing the size of a buffer zone; it is determined on a case-by-case basis.

(18) Mr. Madison

Some of the buildings are located only partially within the buffer zone. Has the Navy considered the possibility of these tenants implementing "reverse containment" such as enclosing their buildings as protection from air borne contaminants?

Navy Response

The Navy did not include only partial buildings in the buffer zone.

(19) Mr. Madison

Will the Navy decontaminate nearby buildings after the removal actions are complete?

Navy Response

Buildings will be decontaminated as necessary.

(20) Mr. Madison

Why is containment of asbestos and metals in the outside environment different from inside containment?

Navy Response

See response to question number 5.

(21) Mr. Chuck Tern, Design Center

How many borings are planned at the site?

Navy Response

This information is included in the sampling plan which is available to the public.

(22) Mr. Donald Knapp, Smith-Emery

Smith-Emery is located near the Tank Farm; they have 80 employees. They view the contamination at the Tank Farm as routine because it is simply petroleum products. A 250-foot buffer zone should not be required for such routine work. Mr. Knapp views the 250-foot buffer zone as a significant business burden and would like input from the regulatory agencies on the determination of the buffer zone. Nobody from the Navy has discussed data or risks associated with the Tank Farm with the tenants. Why wasn't input to the community relations plan solicited from the tenants? Mr. Knapp has asked for a decision from the Navy in writing and has not received a response. Mr. Knapp would like an urgent response.

Navy Response

The Navy views the tenants as important. They have made a concerted effort to involve the entire community, including tenants, in the Hunters Point project. For instance, the Navy has attended meetings with local businesses and invited anybody within the Hunters Point zip code to be on the Hunters Point mailing list.

(23) Mr. Saul Bloom, Arms Control Resource Center

Is the basis for the selection of the four removal action sites that they are easy to cleanup?

Navy Response

See response to question number 7.

(24) Mr. Bloom

Will the removal actions present a greater environmental hazard than leaving the materials in place and remediating the sites within the overall remediation program?

Navy Response

The remediations will be conducted so that they do not create a greater hazard.

(25) Mr. Bloom

Has the Navy considered tenting as opposed to other containment measures?

Navy Response

The Navy is looking into this. While tenting would reduce the potential environmental impact of the removal actions, it would not reduce the potential liability to the Navy due to physical safety issues associated with construction activities.

(26) Mr. Bloom

The explosive safety zones used in Alameda are less than 250 feet. Why aren't explosive vapor safety zones applied to the removal action sites?

Navy Response

See response to question number 4.

(27) Mr. Bloom

What liabilities are associated with tank dismantling?

Navy Response

Tank dismantling will be addressed in the removal action work plans.

(28) Mr. Bloom

Are odors in the soil at the Tank Farm the sole reason for prioritization of this site for a removal action?

Navy Response

See response to question number 7.

(29) Ms. Margaret O'Driscoll, Community Representative to Technical Committee

A full set of project documents is still not available at the local public library. A set should also be placed in the main library.

Navy Response

The Navy will check into the public availability of the project documents.

(30) Ms. O'Driscoll

Will the Navy extend the public comment period for the removal action memos to at least six months so that those community members who are not at the meeting will have a chance to review the transcript of today's meeting?

Navy Response

The Navy will consider this. The public may also provide comment to the Navy at any time during the implementation of this project and the Navy will respond.

(31) Mr. Tony Dimenski, Building 401

The afternoon wind at Hunters Point Annex blows north and would blow airborne contaminants away from the buildings. How was the 250-foot buffer zone determined and can the tenants enclose their buildings?

Navy Response

Since these issues were discussed earlier the Navy agreed to talk to Mr. Dimenski privately after the main program. See response to question numbers 4 and 6.

(32) Paul Wartelle tenants' attorney

What will the format be for response to the community questions? When will the start of the six-month eviction period be?

Navy Response

The Navy response will be summarized in a responsiveness report that will be prepared at the close of the public comment period. The six-month notice period started when the tenants were notified by letter. If additional work done by the Navy to evaluate the 250-foot buffer zone indicates that the notice list needs to be revised, tenants may then be added to the list or taken off.

(33) Mr. Wartelle (comment)

Mr. Wartelle requested that the notification date be revised to that date when limits of the buffer zone are finalized.

(34) Mr. Wartelle

Who suggested the 250-foot buffer zone and what documents were considered in developing the buffer zone?

Navy Response

The Navy made the decision concerning the buffer zone. Records of discussions and publicly available documents were considered in developing the limits of the buffer zone.

E8481-H January 25, 1990

ATTACHMENT 1: WRITTEN COMMENTS RECEIVED REGARDING REMOVAL ACTIONS, HUNTERS POINT ANNEX, NAVAL STATION TREASURE ISLAND

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Point Design Woodworking	Page	1-22

DEPARTMENT OF HEALTH SERVICES
TO SUBSTANCES CONTROL DIVISION

21 ERKELEY WAY, ANNEX 7 BERKELEY, CA 94704

May 10,-1989

Jain Krum

10,-1989

Commanding Officer
Naval Station Treasure Island
Building 1 (Code 70)
San Francisco, CA 94130-5000
ATTN: Mr. Kam Tung

TIME-CRITICAL REMOVAL ACTIONS MEMORANDUM, HUNTERS POINT ANNEX

Dear Mr. Tung:

We have reviewed your memo of April 14, 1989, entitled "Time-Critical Removal Actions, Naval Station Treasure Island, Hunters Point Annex." We believe that these time-critical removals are appropriate to mitigate the potential health hazards at Hunters Point Annex, and we encourage their use. However, until we have received and reviewed the site-specific work plans for these proposed time-critical removals (hereafter referred to as "removal"), we cannot provide any specific comments. At this time, we have the following suggestions that should be considered in the development of the work plans:

- 1. The memorandum states that an exclusion zone 250 feet wide will be maintained for each removal. Since exclusion zones are dependent on a number of site-specific factors, an appropriate rationale for the width of the exclusion zone should be provided for each removal. This information can then be reviewed to determine if the size of each exclusion zone is sufficient to protect public health.
- 2. The proposed removal for the Pickling and Plate yard states that the drying racks in the yard may be decontaminated by sand blasting or scarification. Since these decontamination measures could potentially result in uncontrolled releases of contaminated dusts or mists, we recommend that contaminated structures in the yard be dismantled and disposed as hazardous waste. If decontamination of the drying racks is proposed in the work plan, then sufficient detail should be provided in the plan to ensure that fugitive air emissions are adequately controlled.

We look forward to assisting you with these removals. If you have any questions, please contact Chein Kao of my staff at (415) 540-2593.

Sincerely,

Ric Notini, Chief

Site Mitigation Unit
Region 2
Toxics Substances Control Division

attached list cc:

RN:wo

MAILING LIST - HUNTERS POINT

	Telephone	
•		
Ms. Louise Lew, Head West Central Environment Section Department of the Navy Western Division Naval Facilities Engineering Command	(415) 877-7502 	
P.O. Box 727 San Bruno, CA 94066-0720		
Mr. Nicholas Morgan Remedial Project Manager U.S. Environmental Protection Agency 215 Fremont Street (T-4-3) San Francisco, CA 94105	(415) 974-8603	
Mr. Lester Feldman California Regional Water Quality Control Board 1111 Jackson Street, Room 6040 Oakland, CA 94607	(415) 464-1332	
Mr. Dave Wells Department of Public Health City and County of San Francisco 101 Grove Street, Room 207 San Francisco, CA 94102	(415) 558-3781	
Mr. Scott B. Lutz Bay Area Air Quality Management District 939 Ellis Street San Francisco, CA 94109	(415) 771-6000	
Ms. Lisa Teague Harding Lawson Associates 7655 Redwood Boulevard P.O. Box 578 Novato, CA 94948 File Code 02176H	(415) 892-0821 -	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX .

215 Fremont Street San Francisco, Ca. 94105

Commanding Officer
Naval Station Treasure Island
Building 1 (Code 70)
San Francisco, CA 94130-5000
ATTN: Mr. Kam Tung

June 15, 1989

Dear Mr. Tung:

This is in response to your April 14, 1989 letter proposing implementation of time critical removal actions for three sites at the Hunters Point Annex.

We appreciate your inclusion of EPA in the review process for these proposed actions. Because Hunters Point Annex is not currently listed on the National Priorities List of hazardous waste sites, our resources to review your submittal have been very limited. Accordingly, the comments we are providing are necessarily limited largely to procedural and administrative concerns.

I would like to preface our comments by noting that Section 120 of the Superfund law (CERCLA/SARA) requires that Federal facilities comply with all CERCLA/SARA rules, regulations, criteria and guidelines, including the National Contingency Plan (NCP). Many of the requirements for conducting removal actions are embodied in the existing NCP, proposed revisions to that -- document, published December 21, 1988, and EPA guidance. Accordingly, we have reviewed your submittal for compliance with these documents.

We disagree with your designation of the proposed actions as—
"time-critical" removal actions. As you may recall from our
November 2, 1987 letter concerning removals proposed for the
Hunters Point Annex, EPA has historically used three designations
to differentiate types of removal actions, each of which has its
own procedural requirements. These designations are discussed in
the preamble to the proposed NCP. "Emergency" removals occur
when a release requires that response activities must begin
within hours of a lead agency's determination that a removal action is appropriate. "Time-critical" removals are those where
the lead agency determines that a removal action is appropriate
and that there is a period of less than six months available
before response activities begin on-site. "Non-time critical"
removals are those where, based on the site evaluation, the lead



- 1) According to the NCP [40 CFR 300.71(a)(4)], response actions (including removals) conducted by Federal facilities shall comply with all applicable or relevant and appropriate Federal, State and local requirements (ARARS). Your current proposals neither identify ARARS (example: cleanup levels to be achieved, compliance with the land disposal ban, compliance with the CERCLA offsite disposal policy, identification and protection of endangered species), nor indicate how the proposals will achieve those requirements.
- The proposals were general in nature, and contained insufficient information to judge the nature of the threats posed prior to removal actions, by the removal actions, or to assess the overall scope of the project. It is unclear why these actions pose actual or threatened imminent and substantial threats to human health or the environment. Specifically, for the tank farm, there is minimal discussion of how contaminants themselves pose a threat, who is likely to be exposed, how contamination is likely to impact groundwater, or how impacted groundwater could pose an imminent endangerment. In addition, little information is presented concerning the scope of the removals. example, how much soil is expected to be excavated, to what depth, and over what area? Will the contents of drained tanks be sampled? Will post-excavation samples be conducted to determine if cleanup goals have been met? How will excavated materials be disposed?
 - 2) No substantive information has been presented concerning the schedules for undertaking and completing these removal actions.
 - 3) Alternatives have not been evaluated individually based on the major criteria (effectiveness, implementability and cost), nor have the subcriteria noted in the guidance been addressed.
 - 4) The proposals do not adequately address protection of the community or of workers (example: justification for buffer zone, description of dust prevention methods during excavation, treatment or transport of wastes, days of week and hours of the day that removal actions are likely to be conducted, specification of transport routes).
 - 5) The extent of threat reduction to be achieved via removal action has not been addressed (example: what cleanup level is being sought, comparison of current risks versus risks during and after removal).
 - 6) The duration of removal action hasn't been provided (i.e., the time until threat is abated).



- 7) The potential adverse environmental impacts that may result from the removal action havent been discussed.
- 8) Technical difficulties that may be encountered leading to delays and/or prolonged exposure have not been addressed, nor have environmental factors which may affect the removal action and resultant exposure (example: high winds, runoff to Bay during removal). Contingency measures for these possibilities should be addressed.
- 9) Availability of treatment, storage or disposal capacity for removed wastes must be discussed. In regard to this point, please note that the EE/CA must demonstrate that the removal action will be consistent with the longterm remedy for the site. CERCLA is very clear in its preference for remedies which use treatment technologies to reduce the toxicity, volume or mobility of wastes, and also clearly indicates that offsite disposal of wastes without such treatment is the least preferred remedy. Your EE/CA proposals should indicate how you plan to meet these CERCLA preferences, thereby ensuring consistency with the final remedy. At this point, disposition of removed wastes has not been adequately addressed.

B) COMMUNITY RELATIONS REQUIREMENTS

Specific community relations requirements applicable to non-time critical removal actions are set forth at 300.415(n)(4) of the proposed NCP. These include conducting interviews with the community to solicit concerns, preparing a formal community relations plan specifying community relations actions to be taken during the removal, and establishing an information repository. In addition, a notice must be published in a major local newspaper of the availability of the EE/CA (including a description of the EE/CA), and a comment period of at least 30 days -- must be provided after completion of the EE/CA. Finally, a response to comments must be prepared.

C) OTHER CONCERNS

As you may be aware, the NCP establishes time and dollar restrictions intended to limit actions conducted as removals (proposed limits are 2 million dollars and 1 year). It is EPA's expectation that the Navy will strive to conduct removal actions within these general limitations, as actions which do not generally meet these criteria are probably more appropriately conducted as remedial actions. Therefore, we anticipate that a Record of Decision formalizing remedial actions for these sites will be signed within 1 year.

While EPA strongly supports early action to abate legitimate environmental or public health threats, we must also stress that not all actions will be candidates for removals. Removals should



be reserved for those actions which pose an actual or threatened imminent and substantial threat to public health or the environment.

Finally, please note that any actions performed as "removals" must be considered as interim actions only, and will not necessarily constitute final remedial actions. Accordingly, the final selected remedy may differ substantially from actions conducted as removals, requiring additional investigation and significant cleanup costs (an example would be installation of a cap as a removal action to abate direct contact threats, which may be followed by excavation and treatment of soils).

I hope these comments are helpful to you in fulfilling the requirements of CERCLA and SARA concerning your conduct of response activities at Hunters Point Annex. If you have any questions, please contact me at (415) 974-8904.

Sincerely,

Tulie Anderson Chief

Julie Anderson, Chief Federal Enforcement Section

cc: Ric Notini, CA DOHS
Louise Lew, NAVFACENGCOM
Lester Feldman, RWQCB
Dave Wells, City & County of S.F.
Scott Lutz, BAAQMD
Lisa Teague, Harding Lawson Assoc.

West Bay Law Collective Schectman, Weaver, Wartelle & McCurdy A Professional Corporation

June 14, 1989

Mr. Randy Friedman COM NAV Public Relations Code 022 Naval Station Treasure Island San Francisco, CA 94130

Re: Toxic Clean Up
Hunters Point Annex

Dear Mr. Friedman:

On May 5, 1989 the United States Navy held public hearings concerning the clean up of toxic materials from the Hunters Point Annex. At that hearing I expressed concerns of the tenants of the Hunters Point Shipyard about the Navy's proposal to displace occupants within a 250 foot buffer zone around sites from which toxins will be removed. For the record I would like to summarize those concerns.

- 1. It appears that the 250 foot buffer zone was arbitrarily chosen. The Navy has not yet even determined the method by which toxins will be removed. It is therefore premature to make any assessment based on objective factors of the risk inherent in the toxic removal process. The decision to evict tenants within 250 feet of removal sites was essentially a subjective one designed to create a "comfort zone" for the Navy regarding potential liability. The tenants believe that determinations on displacement should be based on actual risk assessments.
- 2. An exploration should be made of the potential reduction hazard that will be produced by enclosing the toxic removal site while the removal occurs. Containment could either be through the sorts of air tight chambers that are used for interior removal of toxins or through a less elaborate tenting of the removal site. If the concern is airborne materials, any efforts to contain the site should produce a lower risk factor.
- 3. No determination on the buffer zone should be made until the Navy has fully completed its selection of a removal method for the toxic sites in question. Tenants should be given a notice of vacation at the point at which

Mr. Randy Friedman June 14, 1989 Page -2-

a real determination has been made of the risk involved and an objectively based decision has been made for their displacement.

- 4. The Navy should give consideration to how any buffer zone it develops is defined. The 250 feet might be drawn from the center of the removal site rather than the perimeter. Furthermore buildings that are partially in the removal site buffer zone might continue to be occupied if entrances and windows fronting on the buffer zone were properly sealed.
- 5. While toxic removal should be designed to preserve tenants' safety and to minimize the risk inherent in the removal process, due concern should also be given that businesses operating on the Yard not be forced to move unnecessarily.

Thank you for your attention to these issues raised by myself and tenants of the Yard.

Sincerely,

Paul Nartelle (G. B.)
PAUL WARTELLE

PW/ch



Mr. Randy Freidman Naval Station Treasure Island (code 022) San Francisco, Ca. 94130

June 2,1989

RE: Toxic Removal at Hunters Point Shipyard

Dear Sir:

As a tenant of the United States Navy located in the Hunters Point Shipyard, I am greatly concerned with the impact that the toxic cleanup program will have on my business. We are located in building 401 and are 200 feet from the plate yard which is one of the sites slated to begin cleanup this fall. This places us 50 feet within the prescribed evacuation perimeter causing the threat of eviction by October, 1989. I object to this situation and I have three major concerns regarding this matter.

First, I question the basis and legitimacy of establishing a forbidden zone at 250 feet. Does this set precedence for all other toxic removals on government land throughout the state and nation? Since we were told at the public meeting held at the Bayview Opera House that there was no evidentiary basis for establishing this particular number, perhaps the boundary could be reviewed and lessened to a number that would be safe but still allow the businesses to operate? Further information given at that meeting explained that the toxins that would be removed from the plate yard would be heavy in weight and not really subject to floating particulate matter. Prevailing winds blow across the yard with amazing consistency and building 401 is directly upwind from the plate yard. If the airborne condition is not really a problem, then blocking access to the adjacent road should be adequate, thus providing a boundary of 100 feet. The tenants in #401 could use the entrance road on the opposite side of the building which would provide safe ample means of operations and egress. However, if the condition is a problem wouldn't there have to be a containment screen to prevent the matter from blowing back into the bay which lies down wind from the area? This screen would also allow the businesses to continue operations and safeguard the environment.

My next area of concern has to do with timing. I don't want to be forced out until I would really have to go. I have been diligently looking for suitable space for relocation for about six months. The only reasonable areas seem to be located outside the city. We want to keep our business in the City but we are having a very difficult time finding a feasible solution outside the yard. If we do honestly have to leave because of toxic cleanup, can we come back and reoccupy our space after the job is done? I need more time!



My final concern has to do with an alternative answer to the previously mentioned problems. Can we move to a suitable relocation site within the yard? For over eight years we have been good tenants and never been behind in our rent. We have made improvements to our buildings and maintain them in a neat and professional appearance. There are some other great locations for us in the Hunters Point Shipyard.

West Edge is a manufacturer and design firm that specializes in unique custom architectural and industrial metal products such as curved stairs and railings. Most of our business services San Francisco residents and companies, but we have sub-contracted on quite a few government jobs including several U.S. Navy projects. Our type of work requires lots of square footage per man. This is why the shipyard is the last place for our type of art/craft-industrial business to cultivate and harvest its product. There can be a great future for the shipyard and we want to be a productive part of it.

Please respond to my comments and keep me posted on any latest developments concerning these issues. For your convenience my fax # 822-3056.

Sincerely.

Tony Dominski (owner of West Edge)

(ong Comunhi)

c: B.H.P.S.

BUSINESSES OF HUNTERS POINT SHIPYARD

P.O. BOX 883753 • SAN FRANCISCO, CA 94188 • (415) 822-3762

Randy Friedman ComNav Public Relations Code 022 Naval Station Treasure Island San Francisco, CA 94130 June 7, 1989

Re: Recap of our telephone conversation today

DearRandy:

1. My suggestion of the possibility of enclosing the two toxic clean-up sites in question was made in Item 6, of my letter of 5/22/89 with reference to the type of enclosure commonly employed in the course of building fumigation. This procedure, with which I am familiar only as a casual observer, seems to involve a tent-like enclosure employing a material which appears to be canvas, possibly with an impermeable coating. This type of enclosure is apparently deemed adequate to protect the public health when fumigating buildings, presumably with products which are to some extent poisonous, even in close quarters and in the midst of residential areas.

A site the size of the pickling yard (or other sub-sections of the plate yard), I should think could be enclosed within commercially available tenting. The pickling yard and its overheads are comparable in size to common large residential structures, which are routinely fumigated prior to sale in some jurisdictions. Adequate working room around and above the stanchions requiring sandblasting could be easily achieved with simply constructed, relocateable standoffs attached to the existing structure. Some forced air ventilation and lighting would be required, and wet rather than dry sandblasting employed, but these seem problems easily solvable.

I was <u>not</u> referring to an elaborate and doubtless very expensive "clean room" type enclosure with air locks, air tight integrity, and the like. It seems reasonable to think that if this operation can be conducted safely in the open air with the provision of a nominal buffer zone, then an unpressurized canvas enclosure such as I have described would likely be as effective in safeguarding human health, and may offer significantly more protection to the ambient environment as well.

2. The point I made concerning the willingness of affected businesses to contribute to the cost of enclosing either the sites, their own buildings or both should be re-emphasized. While we have not secured commitments from, nor even necessarily discussed this with, each of the affected businesses, my remarks arose from conversations with several owners who did make this suggestion. My belief is that given the opportunity tenants would be willing to bear all or a portion of necessary additional expenses incurred for the clean-up if by doing so they needn't move or close temporarily. Again, it would only be prudent to agree to this when the actual costs are known, but it should be evaluated and the costs estimated for discussion purposes.

On behalf of the tenants, we appreciate the solicitation of public comment and the Navy's willingness to re-evaluate their plans in light of our suggestions. The retention of existing businesses here should be a consideration secondary only to protecting the health and safety of personnel and the environment. We believe the best future use of this Yard depends on preserving a viable core of tenants here, and that our organization and USN have a mutual interest in achieving that.

Very trail yours Scott Madison

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BUSINESSES OF HUNTERS POINT SHIPYARD

P.O. BOX 883753 • SAN FRANCISCO, CA 94188 • (415) 822-3762

May 22, 1989

Randy Friedman Code 022 Naval Station Treasure Island San Francisco, CA 94130

Re: Summary of tenant concerns in regard to Hunters Point Annex toxic cleanup

DearRandy:

Several tenants, as well as BHPS legal counsel Paul Wartelle, addressed specific concerns of Annex tenants at the public meeting conducted by your organization the afternoon of May 5th. Although we assume that those remarks became a part of the record of the proceedings, it was suggested that we reiterate them in written form, I will do that now.

- 1. Considering that the Annex is a patchwork of identified toxic waste sites, some of which are remote from present tenants and pose a more immediate and serious danger to the environment than the pickling yard and tank farm, why has USN chosen to remediate those two particular sites at thistime?
- 2. Panelists at the hearing were unable to offer a definitive basis for the choice of a 250 foot buffer zone. Do the hazardous substances involved in the cleanup pose a demonstrable threat to the health of humans and the environment justifying this buffer zone and the eviction of tenants within the zone?
- 3. What evidence from other cleanup projects can be cited as precedents for the 250 foot buffer zone at these two sites?
- 4. Panelists stated that toxic substances at the pickling yard and tank farm become an immediate threat chiefly when they are disturbed and become airborne as a result of the cleaning process. If these airborne substances pose a threat at 250 feet, given the gusting wind conditions obtaining at the Annex, might they not also pose a threat at considerably farther distances as well, specifically the danger of contamination of the Bay and other work areas which lie directly downwind from the two sites?
- 5. Considering the strength and direction of the prevailing winds, is a buffer zone even an appropriate strategy for countering the threat to the environment posed by airborne toxics?
- 6. Has USN evaluated other strategies for safeguarding tenants' health and the environment in the course of the cleanup? Two that suggest themselves, either of which might be effective alone or in combination are: erecting a physical barrier, such as tenting or heavy PVC enclosure, over and around the sites during the cleanup to prevent the escape of toxic material; or alternately, enclosing the exteriors of occupied buildings in similar fashion to prevent the entry of hazardous particles.

The former might be easily accomplished in the pickling yard where the overhead cranes offer an existing structural support for such an enclosure. The latter approach ought to be considered,

especially in the cases where only a portion of a building falls within the 250 foot zone. The entire building, or the portion lying within the buffer zone, could be effectively sealed, and all entry and egress accomplished from the end of the building lying without the buffer zone. Several affected businesses have indicated their willingness to bear all or a part of the cost of implementing such strategies if by doing so their evictions might be avoided.

- 7. In a building where several businesses occupy discrete areas, with some falling within the 250 foot zone and others not, will all businesses in the building be forced to vacate?
- 8. It is not clear to us what role, if any, meetings such as that on May 5th play in development of cleanup plans. Is the purpose of such meetings merely to announce Navy intentions, or does the public comment have some influence on the development and revision of your plans?
- 9. On several points raised by tenants, such as questions about the 250 foot buffer zone, or alternative means of safeguarding the environment, panelists indicated that further study might offer grounds for revising current plans. Is there any possibility whatsoever that the announced departure schedule may be set back to allow further investigation of the hazards and safeguards, with a view towardsminimizing tenant displacement?
- 10. If a decision is pending as to whether or not further study is appropriate, when might such a decision be expected?
- 11. Panelists stated that tenants may be able to reoccupy their buildings following the presently planned cleanup. However it was also stated that subsequent follow-up site evaluations may necessitate further remedial action. Can there be any assurance that such subsequent remedial actions would not again require tenant displacement?
- 12. USN has said that it may be possible for tenants within the buffer zone to relocate to other buildings. Is there a procedure for applying for such relocation, and if not, how soon can one be put in place?
- 13. If displaced tenants can relocate to other buildings on the property, are cleanup plans sufficiently advanced to insure that these new locations will not, at some future time, also be subject totenanteemoval actions?
 - 14. Generally speaking, what are the future plans for the remaining cleanup of the Annex?
- 15. How will USN respond to the questions and concerns raised at the May 5th meeting, and within what time frame?

These points are, I believe, a summary of the comments and questions brought to the panel by our members and attorney. I trust that you will forward them to your working group for their review and response.

Very truly yours Machism
Scott Madison

S.L. GORDON - Fine Woodwork and Cabinetry

May 23, 1989

Randel Friedman Code 022 Naval Station Treasure Island San Francisco, CA 94130

Dear Mr. Friedman,

Our license af Hunters Point Annex will not be renewed by the Navy beyond September 30, 1989, because we are located within 250 feet of a site (Fickling and Flate Yard) determined to be contaminated by hazardous substances and scheduled for cleanup.

With this in mind, we have these questions:

- 1. If the length of time needed for cleanup is 30 days or less, could we return to our shop space after cleanup is completed?
- 2. If the cleanup period is more than 30 days, could we be relocated in another space at Hunters Foint?
- 3. What is the procedure for relocating to another space at Hunters Foint?

We would not be opposed to sharing space with other tenants temporarily relocated because of the hazardous substance cleanup.

During the five years we have operated our cusiness from Hunters foint, we have been current with both our rent and utility payments. We consider ourselves to be desirable tenants and can see no reason why we should not be relocated.

We use no Navy equipment; we own all the machinery and tools that we use. Therefore, moving to another location would be no problem for us.

We are looking forward to your answers to our questions as soon as possible. We really do want to stay at Hunters Foint Annex and continue to operate our business from this location.

Thank you very much for your help in this matter.

Sincerely

Samuel in Cordon

Shop

Hunters Point Navel Shipyard Hussey Street Bldg. 401 San Francisco, CA 94124 (415) 822-8520 Mailing

1215 Lattie Lane Mill Valley, CA 94941 (415) 383-3005

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SMITH-EMERY COMPANY



The Full Service Independent Testing Laboratory, Established 1004

P.O. Box 880550 Hunters Point Shipyard San Francisco, California 94188 (415) 822-8880 Fax (415) 822-5864

May 31, 1989

Randall Friedman Community Relations Director Commander Naval Base (SF) Staff Code 022 San Francisco, CA 94130

Subj: Eviction/Hunters Point Naval Shipyard

Dear Sir:

At the meeting on 5/5/89 at the Opera House, you spoke about wanting input. I am sending you a copy of my letter to NAVFAEC and Captain Krumm, dated 4/17/89.

At the 5/5 public meeting I spoke about the fact that my letter had not been responded to by the Navy. CDR Crosby made notes, as did some of the committee people. I've checked with Mrs. Freitas weekly since then, and...you guessed it....still no reply! The code words of choice these days seems to be, "the contents are being evaluated".

My 4/17 letter states Smith-Emery's position and requests very clearly. I won't elaborate, but would ask you to provide the committee with this information so it, too, can "evaluate the contents".

Note that in the last paragraph I asked for a rapid response. I'm glad I did, for I shudder to think what the response time would have been if I'd asked for a routine response.

July 1 is fast approaching, Mr. Friedman, and we are not getting much help or feedback out of the Navy.

Sincerely,

SMITH/EMERY COMPANY

Donald J. Knapp,

Vice President/General Manager

DJK/lp

Enclosure: Smith-Emery letter dated 4/17/89

cc: (with enclosure) Capt. T.G. Krumm, USN
Beverly Frietas, NAVFAEC

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Los Angeles

Anaheim

SMITH-EMERY COMPANY



The Full Service Independent Testing Laboratory, Established 1904

Hunters Point Shipyard, Bldg. 114 P.O. Box 880550 San Francisco, California 94188 (415) 822-8880 Fax (415) 822-5864

April 17, 1989

NAVFAEC Real Estate Division P.O. Box 727 San Bruno, CA 94066-0720

Attn: Beverly Freitas

Re: 1.) Navy Meeting At All Hands Club 4/11/89.

2.) Real Estate Division Letter dtd 4/10/89 - Eviction Notice

Dear Mrs. Freitas:

Confirming my requests to you at the 4/11 meeting (Reference 1), Smith-Emery requests swift action and decisions on two issues:

1.) Possible relocation within the H.P. yard.

We would be willing to relocate to a suitable industrial facility. We would need a long-term lease, up to five years, in order to justify capital improvements we would have to make there. Our needs are 6,800 sq. ft. shop, and 2,100 sq. ft. office. (Or, industrial space of 8,000 sq. ft. in total, and we will build the offices we need.)

Please contact the undersigned if there are further questions about our space and facilities needs.

2.) On another matter, if item 1.) is not possible, we have been advised that DOD has funds for assisting businesses to relocate when a base is closed. Would you please provide details of where and how we might apply for such?

It is our contention that the Navy is evicting us solely for its convenience (i.e.-clean up of sites around us, and removing PCB type transformers). So, constructively, the base is being closed down for this particular tenant, and we are severely impacted as a result.

Page 1-18

Anaheim

Los Angeles

5427 East La Palma Ave. Anaheim, California 92807 (714) 693-1026 Fax (714) 693-1034

SMITH-EMERY COMPANY

April 17, 1989 Page 2

Lastly, I should like to formally request waivers to the Navy's proposed actions as follows:

- A.) Waiver for Smith-Emery to the 250' radius while Bldg. 123 and the tank farm are cleaned up. There has been no evidence presented to us concerning the nature and scope of the so-called hazardous materials below ground, nor reasons why we should or should not vacate for the Navy's convenience while clean-up of Bldg. 123 and the tank farm proceeds. Also, there has been no information presented on the scientific correctness of the 250' radius, or even if it is required at all.
- B.) Waiver for Smith-Emery to the Navy's decision not to replace the PCB type transformer near us, once it is removed. If Smith-Emery is permitted to stay in Building 114, under a long-term lease, we would consider purchasing, installing and maintaining a non-PCB tranformer after you have removed the old one.

Your rapid response to the matters herein (1. and 2.; and A and B) would be most appreciated. We have important and urgent decisions to make in order to run our business. Some of our work, as you know is in support of Navy and other DOD Construction projects in the area.

Sincerely,

SMITH-EMERY COMPANY

Donald J. Knapp, P.E.

Vice President/General Manager

DJK/1p

cc: Capt. T.G. Krumm, USN



June 13, 1989

Mr. Randal Friedman, Code 022 Commander Naval Base San Francisco Building 1, Treasure Island San Francisco, CA 94130-5018

Reference: Release 12, Dated June 6, 1989

Hunter's Point Annex Information Release

Dear Mr. Friedman:

- 1. We applaud the environmental clean-up process at Hunter's Point Annex. We have been tenants for 10 years at the base and have witnessed much.
- 2. The new entry way into the base has been beautifully done.

 The new homes on Harbor Street on the Navy donated land are a big upgrade to the whole neighborhood. Progress is being made.
- 3. To the extent we can, Christian Engineering will cooperate in the program, pro bono. There is a long way to go regardless of the ultimate use of the base.
- 4. You have told me that we are "impacted" by the Pickling and Plate Yard removal action.
- 5. Until we can examine the detailed work plans we can only offer our thoughts, and make some requests.
- 6. We enclose a plan view of the plate yard and adjacent building. Our offices are in the second floor of Bldg. 411 and we have an entrance on the cross street of the plate storage yard and a fire exit on Cochrane Street.
- 7. If needs be, we can keep our front door closed up and use the Cochrane Street door to enter the office, while whatever clean-up work takes place. We ask that you grant that permission to us.
- 8. Our shop is the back half of Bldg. 366 which we consider outside of any zone affected. Our dimensional drawing shows the area.
- 9. Nevertheless, we are prepared to close the shop during the day and operate between the hours of 8 P.M. until 6 A.M. while clean-up work goes on. Alternatively, we are prepared to close the shop for a month long vacation for all if we are given your exact time schedule.

CHRISTIAN ENGINEERING • BUILDING 411 • HUNTERS POINT • SAN FRANCISCO, CA 94124
TELEPHONE: (415) 822-1080 • TELEX NO: 340-236 • CABLE: CHRISENGRS, San Francisco
BULK TRANSFER AND PROCESS EQUIPMENT

Page 1-70

- 10. We consider that experts will agree that the major clean-up area is the pickling area. This is presently fenced in but the gate is open.
- 11. Your information release indicated that 11 transformers will be removed within the next 6 months. Would you please let us know which ones they are? Do any of them service our shop or office?
- 12. We would like to know this fairly soon as we may offer to furnish a transformer including title thereto.
- 13. There are several graduate engineers on the base in private business. Expertise in mechanical, civil, chemical and electrical engineering exists. There are also some very practical "hands on" types as well, who may not "look good on paper" but like most of the rest of us are people of good will and have a common interest.
- 14. This is a "home away from home" for several of us. I am certain that if the Navy technical people would tap the knowledge or energy that exists in the "humanware" here, it could be a "win-win".

 situation.
- 15. I am willing to join you on such a program if you say so. Meanwhile, please keep my name on the waiting list.

Yours very truly,

CHRISTIAN ENGINEERING

Robert F Christian

RFC/clv

Encl: a/s

P.S. Where is the Information Repository located?

June 15, 1989

Randy Freeman Comander Naval Public Relations Code022 Naval Station Treasure Island San Francisco, CA 94130

RE: Toxic Clean Up at Hunters Point Ship Yard

Dear Randy,

Thank you for the opportunity to comment on the Navy's proposal to clean up the toxic waste at Hunters Point ship yard. My business is located in Bldg. 401, which is directly affected by the clean up of the pickling yard.

Although my own business is outside the 250' barrier zone (approximately the same distance as Sup Ship) I am concerned about the safety of this procedure. As I understand it, the current proposal is to sand blast the super structure of the pickling yard without enclosure. The air born particles are the major concern for health and safety. I have heard, second hand, that the danger is as serious as sand blasting a ship in dry dock #4; air born particles end up downwind in Oakland or the bay, Bldg, 401 is windward, so I don't worry much.

We hope that you will be willing to consider another alternative, possibilly using an inexpensive enclosure similar to that used during furnigation of residential buildings. It seems that the businesses located in Bldg. 401 might be willing to bear some small cost for such an enclosure if it meant that we could continue operations during cleaning.

Sincerely,

POINT DESIGN WOODWORKS

Ken Ireland

KI:vr

ATTACHMENT 2 SUMMARY OF COMMUNITY RELATIONS ACTIVITIES

RESPONSIVENESS SUMMARY FOR HAZARDOUS WASTE REMOVAL ACTIONS

DATED 01 FEBRUARY 1990

1 December 1987	Navy distributes Information Release #1 providing overview to clean-up process and community relations program
2 December 1987	Community Relations Scoping Meeting with elected officials
3 December 1987	Community Relations Scoping Meeting with community representatives
9 December 1987	Community Relations Scoping Meeting with environmental groups
9 December 1987	Navy distributes Information Release #2 announcing removal of PCB contaminated oil in Tank S-505
January 1987	Community Interviews conducted with elected officials, community representatives, regulatory officials and environmental groups
27 January 1987	Navy distributes Information Release #3 announcing removal of chlorine gas cylinders
8 February 1987	Navy distributes Information Release #4 announcing District Attorney investigation of alleged Triple A Machine Shop hazardous waste disposal
23 May 1988	Navy distributes Information Release #5 announcing removal of PCB contaminated soil near former Building 503
3 August 1988	Navy distributes Information Release #6 announcing community meetings, start of reconnaissance activities, submittal of community relations plan, beginning of sampling and hiring of environmental community relations specialist
3 August 1988	Navy establishes Information Repository at San Francisco Public Library, Anna E. Waden Branch, 5075 Third Street, San Francisco, CA
12 August 1988	Navy distributes Information Release #7 describing completion of PCB contaminated soil at former Building 503, removal of leaking PCB transformers and upcoming community meetings
24 August 1988	Afternoon community meeting at Bayview Opera House
24 August 1988	Evening community meting at Bayview Opera House

- 23 September 1988 Navy distributes Information Release #8
 describing disposal of hazardous waste from
 Fence-to-Fence Survey and removal of PCB oil
- 20 October 1988 Navy begins Environmental Outreach Program including thirty-five dates and an estimated viewing of 10,00 persons (see attachment 3)
- 2 December 1989

 Navy distributes Information Release #9
 announcing completion of Community Relations
 Plan, availability of Environmental Outreach
 Program, formation of Technical Review
 Committee, continued disposal of hazardous
 waste from Fence-to-Fence Survey, pilot program
 for treatment of sandblast waste to begin, and
 the planning of removal actions at five sites
 at Hunters Point Annex
- 10 January 1989 As part of the Navy's Environmental Outreach Program, the Navy conducts a mailing to every postal customer in the 94124 zip code (10,500 names) with a return card for being added to the Hunters Point Annex mailing list
- 19 January 1989 Navy distributes Information Release #10 describing change in disposal plans for PCB contaminated oil from Tank S-505, and disposal of hazardous waste from remedial investigations
- 6 March 1989

 Navy sends letter and information brochure to 550 new members of the Hunters Point Annex mailing list added by the outreach program
- 14 April 1989

 Navy distributes Information Release #11
 announcing community meeting, public comment
 period on removal actions, completion of
 reconnaissance activities, discussion of
 whether Hunters Point Annex is contaminated
 with radioactive wastes, welcome to new mailing
 list members, appointment of public member to
 the Technical Review Committee by the mayor of
 San Francisco, availability of the
 environmental outreach display in the Bayview
 community and continued disposal of soil from
 site investigations
- 26 April 1989 Navy publishes newspaper notice in the Sun Reporter announcing upcoming community meeting and public comment period on proposed removal actions at Hunters Point Annex

ATTACHMENT 2: SUMMARY OF COMMUNITY RELATIONS ACTIVITIES

5 May 1989	Navy holds community meeting at Bayview Opera House describing clean-up program, removal actions and receiving public testimony on removal actions.
5 May 1989	Navy holds information open house at Bayview Opera House on the environmental cleanup program and proposed removal actions
6 June 1989	Navy distributes Information Release #12 announcing extension of public comment period for removal actions and a summary of the Hunters Point Annex Community Relations Program
13 July 1989	Navy distributes Information Release #13 announcing proposed inclusion of Hunters Point Annex on National Priorities List by the United States Environmental Protection Agency, a description of the listing process, the past work the Navy has done with the State of California, the role of the EPA in the ongoing investigation, the significance of Hunters Point annex on the National Priorities List, a discussion of what an Interagency Agreement, the availability of Technical Assistance Grants, the continuing role of the State of California, where to go for questions, will removal actions be affected, and a discussion of why the Navy is conducting removal actions at Hunters Point Annex
13 July 1989	Navy establishes second Information Repository at San Francisco Public Library, Main Library, Corner of Larking and McAllister, San Francisco, CA
ļl August 1989	Navy distributes Information Release #14 announcing implementation of demonstration sandblast treatment project and appointment of project manager for Hunters Point Annex by Environmental Protection Agency
16 February 1990	Navy distributes Information Release #15 describing worplans and Responsiveness Summary of Removal Actions, a new public comment period, a summary of the workplans, and a discussion of public health concents during the removal actions.
16 February 1990	Navy releases Responsiveness Summary of public comments on proposed removal actions at Hunters Point Annex.

ATTACHMENT 3 ENVIRONMENTAL OUTREACH PROGRAM: SUMMARY AND RECORD OF DATES

RESPONSIVENESS SUMMARY FOR HAZARDOUS WASTE REMOVAL ACTIONS

DATED 01 FEBRUARY 1990

HUNTERS POINT ANNEX ENVIRONMENTAL OUTREACH PROGRAM: SUMMARY AND RECORD OF DATES

In one of the first such efforts undertaken in the country, the United States Navy has created an environmental outreach program as part of the environmental clean-up of Hunters Point Annex, Naval Station Treasure Island, San Francisco, California. The program brings the community relations process for the clean-up of Hunters Point Annex directly into the community. The core of the program is a visual display of the environmental clean-up process. The display includes sections on historical background, the environmental problems at Hunters Point Annex, the Navy's Installation Restoration Program and the community relations program. The display was created at the onset of the Remedial Investigation, and was concurrent with completion of the Community Relations Plan. The display was created by Naval Base San Francisco and Western Division Naval Engineering Facility Command staff.

The display has been set-up at community meetings, events and businesses throughout the Bayview/Hunters Point Community and throughout San Francisco. By utilizing the existing large network of community groups and events, the Navy has been able to reach the largest number of residents. To date, the environmental outreach program has included forty dates and has been viewed by an estimated 13,410 persons. The display was recently shown at the San Francisco Fleet Week 1989. While exact counts are impossible, an estimated 100,000 people passed the display's location at Pier 39 in San Francisco.

One particular location is utilized extensively in this program. Bayview/Hunters Point has only one bank and one savings and loan branch. In addition, a large percentage of Bayview/Hunters Point residents receive some form of government payment, e.g. security, aid to families with dependent children and retirement (including former shipyard workers). These checks are mailed and received on known dates. Given this situation, the Navy has made arrangements with the savings and loan branch which holds accounts for more than one-half of the households in the area to set up the display during the times when government checks are deposited. On these days the branch will often have a line of 30-50 people all day long. The display was set-up next to the queue of customers, allowing the customers to read the display while they waited in line (Exhibit 2). This process has been repeated over five months to assure the deepest saturation of information by community members.

In July 1989 the United States Environmental Protection Agency proposed inclusion of Hunters Point Annex on the National Priorities List. This proposed listing resulted in coverage by the print and electronic media, bringing the environmental cleanup of Hunters Point Annex back to the news. In anticipation of an increase in potential community awareness from this media

coverage, showings of the display were again made at the local savings and loan branch over a two-week period.

Accompanying the display at these meetings and events are sign-up forms for the Navy's mailing list and a brochure summarizing the display (Exhibit 3). Three months into the environmental outreach program the Navy conducted a mailing to each postal customer in the Bayview/Hunters Point zip code, a total of 10,500 individuals and business. This mailing introduced the community to the clean-up process and had a return card for placement on the Hunters Point Annex mailing list.

The mailing list ties the environmental outreach program into the remainder of the Navy's community relations program. Information Releases are regularly distributed to parties on the mailing list. These Information Releases describe all phases of the environmental clean-up process including site activities, upcoming community meetings, public comment periods, public hearings, public health information, results of investigations, upcoming removal actions, and information on documents available in Information Repositories. To date the Navy has distributed 14 Information Releases. Prior to commencement of the outreach program the mailing list included 240 persons and organizations. Presently, the mailing list consists of approximately 700 persons and organizations.

At the conclusion of the Remedial Investigation/Feasibility Study, the display will be revised to reflect the findings of the Investigation, strategies considered in the Feasibility Study, and the Navy's proposed clean-up plan. At this time the Environmental Outreach Program will enter its second phase and be used to provide information on the decision-making portion of the Installation Restoration Program.

DATE	LOCATION	ESTIMATED ATTENDANCE	TYPE EVENT
	San Francisco Planning and Urban Research Association	30	a
l November 1988	New Bayview Homeowners Association	10	a
5 November 1988	Friends of Candlestick Point State Recreation Area	10	a
12 November 1988	100 Year Anniversary Celebration of Bayview Opera House	450	a,b
	Bayview Federal Savings, Bayview/ Hunters Point Branch	700	a,b
5 December 1988	Bayview Federal Savings, Bayview/ Hunters Point Branch	500	a,b
8 December 1988	Businesses of Hunters Point Shipya	rd 100	b
23 December 1988	San Francisco Greens	3	С
24 January 1989	Bayview/Hunters Point Ecumenical Council	20	a,b
25 January 1989	New Bayview Committee	35 .	a,b
1 February 1989	Bayview Federal Savings, Bayview Hunters Point Branch	700	a,b
2 February 1989	Bayview Federal Savings, Bayview Hunters Point Branch	500	a,b
3 February 1989	Bayview Federal Savings, Bayview Hunters Point Branch	800	a,b
4 February 1989	Public Forum for South Bayshore Pl A Proposal for Citizen Review, Lwanga-Ruiz Center	an: 35	b
8 February 1989	Bayview Hunters Point Homeowners a Community Development Council	nd 30	a,b
13 February 1989	Woodrow Wilson High School Faculty Meeting	70	a,b

DATE	LOCATION	ESTIMATED ATTENDANCE	TYPE EVENT
1 March 1989	Sierra Club San Francisco Chapter Membership meeting, State Building	70	a,b
15 March 1989	University of California San Franci Animal Care Staff Meeting	isco 60	b
18 March 1989	Public Workshop, South Bayshore Pla Bayview Opera House	an 10	þ
25 March 1989	Public Workshop, South Bayshore Pla Bayview Opera House	an 10	b
31 March 1989	Bayview Federal Savings, Bayview Hunters Point Branch	750	a,b
3 April 1989	Bayview Federal Savings, Bayview Hunters Point Branch	650	a,b
4 April 1989	Bayview Federal Savings, Bayview Hunters Point Branch	500	a,b
8 April 1989	Public Workshop, South Bayshore Pla Bayview Opera House	an 20	b
1 May 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	700	a,b
2 May 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	600	a,b
3 May 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	500	a,b
4 May 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	300	a,b
5 May 1989	Community Meeting for Hunters Point Annex Environmental Clean-up Bayview Opera House	, 50	a,b
21 June 1989	Community Meeting for Southern Pacific/Brisbane		
	Hazardous Waste Clean-up	15	ъ

attachment 3

ENVIRONMENTAL OUTREACH PROGRAM: RECORD OF EVENTS

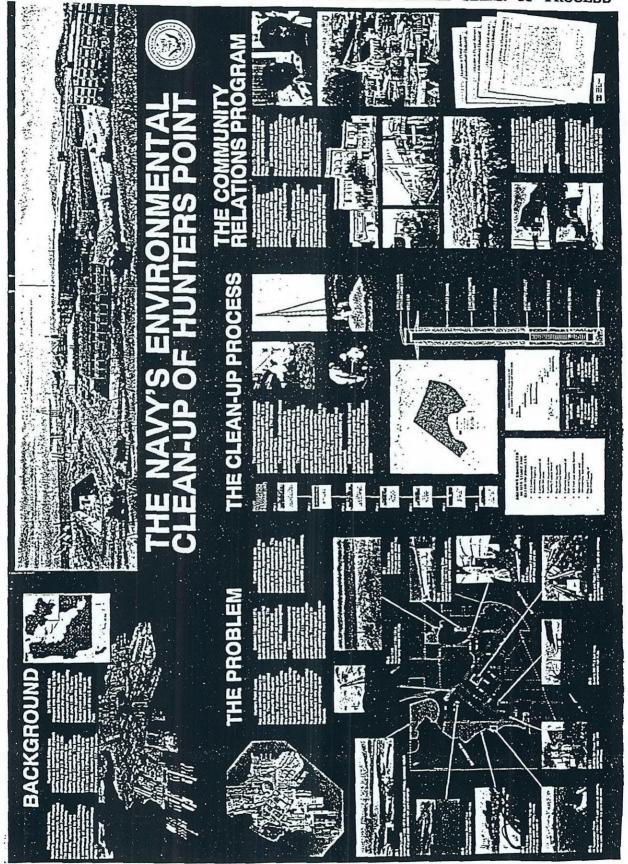
DATE	LOCATION	ESTIMATED ATTENDANCE	TYPE EVENT
l August 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	750	a,b
2 August 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	700	a,b
3 August 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	850	a,b
4 August 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	900	a,b
7 August 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	550	a,b
8 August 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	500	a,b
9 August 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	450	a,b
10 August 1989	Bayview Federal Savings, Bayview/ Hunters Point Branch	400	a,b
16 August 1989	New Bayview Committee	30	b

Key to Events:

a: Visual Display set-upb: Brochures distributed

c: Tour of Hunters Point

EXHIBIT ONE: VISUAL DISPLAY OF ENVIRONMENTAL CLEAN-UP PROCESS



attachment 3

EXHIBIT TWO: VISUAL DISPLAY AT LOCAL SAVINGS AND LOAN BRANCH



